

Has the debtor filed all applicable tax returns?

Yes

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No

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If no, please explain:

Has the debtor paid all taxes entitled to administrative expense priority? Yes

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No

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If no, please explain:

Please detail the efforts the debtor has undertaken and will undertake to attain a consensual plan of reorganization: The Debtors have engaged in preliminary discussions with the Internal Revenue Service and PA Department of Revenue, which, in addition to the Debtors' mortgage lender, collectively hold the largest claims in the case. Upon completion of the Debtors' cash flow projections, the Debtors anticipate advancing discussions with the foregoing taxing authorities and the Debtors' mortgage lender with the goal of achieving a consensual plan.

Other relevant information:

Note: Debtor must file a plan not later than 90 days after entry of order for relief.

Unless the court extends the deadline upon a finding that extension is "attributable to circumstances for which the debtor should not justly be held accountable." See, 11 U.S.C. § 1189(b).

This status report must be served on the trustee and all parties in interest.

Date: 2/16/21

David Smith
Attorney for Debtors